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*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products  
Liability Litigation

No. 2:15-MD-02641-DGC

**JOINT MOTION TO EXTEND THE  
TIME FOR FILING A DISMISSAL FOR  
THOSE CASES THAT ARE SUBJECT  
TO SETTLEMENT AGREEMENTS  
AND THE PLAINTIFFS HAVE SIGNED  
RELEASES**

1 In an order dated July 16, 2020 (Doc. 21540), the Court ordered the parties to submit  
2 a joint report on November 13, 2020 identifying those cases remaining in the MDL that  
3 were not dismissed by November 2, 2020. The order further required the parties to submit  
4 the necessary information regarding those cases so that they could be remanded or  
5 transferred to the appropriate jurisdiction.

6 With this motion, the parties respectfully request that the Court extend that deadline  
7 for a specific subset of the remaining cases that are unquestionably settled. This subset  
8 consists of approximately 901 cases which are subject to settlement agreements, where the  
9 plaintiffs have already signed a release of all claims against the defendants (thereby  
10 committing to the settlements and waiving the ability to opt out of the settlements). The  
11 plaintiffs have been unable to dismiss those cases, however, because – for a variety of  
12 reasons – the settlement funds have not been disbursed as of yet. Additional time should  
13 permit the parties to complete the resolution of lien issues and to finalize the settlements,  
14 thereby allowing the disbursement of funds and the settlement of the actions.

15 For those reasons, the parties jointly request that the Court extend the deadline for  
16 filing dismissals in the cases identified on Exhibit “A” until March 15, 2021. In turn, the  
17 parties would submit the report required by the July 16, 2020 order for the remaining  
18 plaintiffs who have not filed a dismissal.

19 The parties stand ready to address any questions or concerns about this request that  
20 the Court may have.  
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1 RESPECTFULLY SUBMITTED this 6th day of November, 2020.

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3 BEUS GILBERT PLLC

4 By: /s/ Mark O'Connor (with permission)

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